

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

Including:

Statement Explaining How Operating Procedures Ensure Regulatory Compliance

Explanation of Any Actions Against Data Brokers, and

Summary of all Customer Complaints Received

Jon W. Cribbs signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Kaleva Telephone Company (Company), related to the previous calendar year, 2011.

This Certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Company provide:

- A "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

On Behalf Of The Company, I Certify As Follows:

1. I am the President of the Company, I am an officer of the Company, and I am acting as an agent of the Company. My business address is 9462 Osmo St./ P.O. Box 006, Kaleva, MI 49645. The Company's Form 499 Filer ID is 808227.

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to CPNI, 47 CFR 64.2001 *et seq.*

Statement Explaining How Operating Procedures Ensure Regulatory Compliance

3. I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the FCC's regulations governing CPNI.

4. The Company ensures that it is in compliance with the FCC's CPNI regulations. The Company trains its personnel regarding when they are authorized to use CPNI, when they are not authorized to use CPNI, and how to safeguard CPNI. The Company maintains a CPNI Compliance Manual in its offices for purposes of training of new and current employees, and as a reference guide for all CPNI issues. Our CPNI Compliance Manual is updated to account for any changes in law relating to CPNI. The

CPNI Manual contains key all essential information and forms to ensure the Company's compliance with CPNI regulations.

5. The Company has established a system by which the status of a Customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

6. Company personnel make no decisions regarding CPNI without first consulting with management.

7. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

8. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

9. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

10. Further, management oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the Customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations for compliance therewith. Before soliciting for approval of the use of a Customer's CPNI, the Company will notify the Customer of his or her right to restrict use of, disclosure of, and access to, his or her CPNI.

11. The Company maintains records of Customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

12. The Company trains its personnel for compliance with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods for telephone access, online access, and in-store access to CPNI, and the prevention of access to CPNI (and Call Detail Information in particular) by data brokers or "pre-texters." In-store visits require valid photo identification.

13. The Company, on an ongoing basis, reviews changes in law affecting CPNI, and updates and trains company personnel accordingly.

Explanation of Actions Against Data Brokers

14. The Company has not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains .

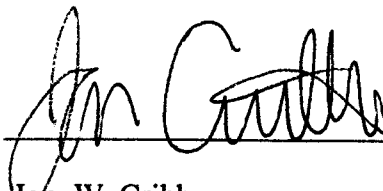
Summary of all Customer Complaints Received

15. The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None.

16. The Company does not at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI.

The company represents and warrants that this certification is consistent with 47 CFR 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Date: February 29, 2012

A handwritten signature in black ink, appearing to read "Jon W. Cribbs", is written over a horizontal line.

Jon W. Cribbs
President
Kaleva Telephone Company

IMPORTANT CUSTOMER NOTICE

The Federal Communications Commission (FCC) recently issued new regulations intended to protect the privacy of your call detail information on file with KALEVA TELEPHONE COMPANY. This information includes specific telephone call data, such as the number called, time, location, or call duration. The rules prohibit KALEVA TELEPHONE COMPANY from releasing any call detail information during customer-initiated telephone contact without first verifying that the identity of the caller matches the customer name on the account.

The FCC has expressed concern that individuals "pretending" to be customers are attempting to obtain call detail information from telecommunications companies by calling to discuss "billing questions." Consequently, the new rules allow KALEVA TELEPHONE COMPANY to share call detail information only with you, our customer, under two circumstances: You may come into our office to ask questions and present a valid photo ID matching the name on the account; or, you can call us with your billing questions and tell us the call detail information on your bill that you are questioning, such as telephone number called and time of call.

If you decide to call us with a billing question but do not have a copy of your bill, the FCC's new rules provide three alternatives:

- (1) You can ask us to call you back to discuss your billing questions, but we can only call the telephone number that is listed on your account.
- (2) You can request that a copy of your bill be sent to you at the billing address listed in our account records. When you receive it, you can call us and provide the call detail information when you ask your question.
- (3) You can provide us with a pre-established password, and then we can discuss your billing questions.

If you wish to establish a password for your account, to facilitate the discussion of your billing questions over the phone, please contact KALEVA TELEPHONE COMPANY at your earliest convenience.

In addition, if you wish to add an individual as an authorized user of your account, and enabling that individual to obtain call detail information on your behalf, please contact us. If you wish to rely on someone else to discuss account changes, payments, or any call detail information, you must add that person's name to your account. Any contact(s) that you authorize will not be responsible for payment of this account.

If you have any questions concerning this matter, please call us at: 231-362-3111

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